

# **EXHIBIT 13**

**From:** David Campbell <dcampbell@dhdgclaw.com>  
**Sent:** Thursday, April 22, 2021 1:09 PM  
**To:** Strauss, Samantha A  
**Cc:** Siegel, Joshua; Mills, David  
**Subject:** RE: Stipulations as to Authenticity - Follow Up

[External]

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Samantha,

My apologies, and thank you for pointing that out. I looked over the initial disclosures and responses to interrogatories and requests for production for just this sort of thing. However, I neglected to look at the RFA responses. I will not refuse a stipulation on the basis that Fields did not use an account that he has already admitted using in the RFAs.

As for the attempted deposition, Fields refused to be sworn in for his testimony. He did "appear" and did converse with counsel for nearly an hour. The fact that he was not initially sworn in was realized some ways into the attempted questioning. He refused to answer nearly all questions and focused on repeatedly reporting his perceived mistreatment at the facility and demands to be removed from the prison to a medical facility for treatment and that all legal questioning/testimony be in person.

Thanks,  
Dave

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**From:** Strauss, Samantha A <sastrauss@cooley.com>  
**Sent:** Wednesday, April 21, 2021 3:13 PM  
**To:** David Campbell <dcampbell@dhdgclaw.com>  
**Cc:** Siegel, Joshua <jsiegel@cooley.com>; Mills, David <dmills@cooley.com>  
**Subject:** RE: Stipulations as to Authenticity - Follow Up

Dave,

Thank you for letting us know about the deposition subpoena. Did the deposition go forward on the 16th?

We also wanted to follow up with you regarding the Stipulations. You mentioned one problem you had with some of them was they referred to certain social media accounts as Fields's accounts, but you have not been able to get him to confirm he used them. In his response to the RFAs, however, Fields already admitted using each of the accounts mentioned in the stipulations (with the exception of the "AzrielLevy" account, which he had not disclosed at the time we served the RFAs). We are including the full Requests for Admissions for your convenience (see, e.g., RFA Nos. 367, 375, 376, and 377).

Given that Fields has already admitted to using these social media accounts, please confirm that you will not refuse a stipulation on the basis that it references the fact that Fields used an account which he already admitted using in his response to the RFAs. With that understanding, we expect to get you a revised draft this week.

Thanks,

**Samantha Strauss**

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**From:** David Campbell <[dcampbell@dhdgclaw.com](mailto:dcampbell@dhdgclaw.com)>  
**Sent:** Wednesday, April 14, 2021 5:02 PM  
**To:** Strauss, Samantha A <[sastrauss@cooley.com](mailto:sastrauss@cooley.com)>  
**Cc:** Siegel, Joshua <[jsiegel@cooley.com](mailto:jsiegel@cooley.com)>; Mills, David <[dmills@cooley.com](mailto:dmills@cooley.com)>  
**Subject:** RE: Stipulations as to Authenticity - Follow Up

**[External]**

All,

Just wanted to give you a heads up of an issue related to Fields that does not necessarily concern this case but I am sure would be of interest to you. Yesterday afternoon, I received an email from an attorney, John Burns who advised that he had served James Fields with a non-party witness deposition subpoena for case arising from events related to August 12, 2017. I have attached the deposition notice I received just today. No one from the prison has ever responded to any of his phone calls or messages, and no one provided him with any information as to counsel for Fields. I spoke with Mr. Burns and advised that I did not believe I could move to quash his subpoena based on the same Court's ruling on my motion to quash in the Sines, et. al. case. I did direct him to the document number of my motion to quash to demonstrate the issues I think he will run into if the BOP makes Fields available Friday.

I have agreed to participate via Zoom and see what happens on Friday. Perhaps this will be instructive in our case. Mr. Burns has not received any confirmation from BOP folks as to whether they are even going to make Fields available pursuant to his subpoena. I will report back promptly on what, if anything, happens.

Thanks,  
Dave